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December 12, 2003

VIA HAND DELIVERY

Hon. Deborah Taylor Tate, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Implementation of the Federal Communications Commission's Triennial  
Review Order (Nine-month Proceeding)(Switching)*  
Docket No. 03-00491

Dear Chairman Tate:

Enclosed are the original and fourteen copies of the non-proprietary portions of BellSouth's Second Supplemental Responses to MCI's discovery propounded in this docket. Proprietary portions of the responses are being filed under separate cover pursuant to the Protective Order adopted on November 21, 2003. Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch

REQUEST: For each CLLI code in Tennessee, please provide the number of individual cross connects/jumper jobs performed on (1) the MDF, and (2) any IDF(s), during each month since July 1, 2001.

SECOND SUPPLEMENTAL RESPONSE:

BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Subject to this objection, and without waiving this objection, data concerning jumper activity on MDFs are maintained only on a rolling basis and are being provided in BellSouth's Second Supplemental Response to MCI's First Request for Production of Documents, Item No. 1. No data is available for jumper activity on the IDF(s). This information is proprietary and is being provided subject to the protective agreement in this proceeding.

RESPONSE PROVIDED BY: Wayne Gray

REQUEST: Please provide the name(s) of the work group(s) whose members routinely perform cross connects/jumper jobs in BellSouth central offices, and provide the following information for each:

- (a) a list and description of every job classification (e.g. frame technician) within such work group(s);
- (b) whether each job classification is staffed by members of a union, and whether non-union employees may perform the same job function;
- (c) for each job classification, the minimum job requirements, including training, job experience, education, etc;
- (d) a description of all on-the-job training required or provided for each job classification once in the position;
- (e) a copy of the methods and procedures or similar documents that contain any kind of instructions specifying the steps, processes, techniques, tasks, materials, etc. for performing cross connects/jumper jobs.

SECOND SUPPLEMENTAL RESPONSE:

The Network Operations, Central Office Field Work Group performs cross connects/jumper jobs.

- (a) Information responsive to this request is available at the following URL link:

<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-12/>

The responsive documents to this request are included in the file:

GA\_17749-U\_BST\_SUPP\_To\_MCI\_1\_INTERPOD.pdf

- (b) Both COET and FA job titles are staffed by union and non-union employees.

RESPONSE: (Cont.)

(c) Job requirements are available at the following website:

[http://www.bellsouth.com/employment/study\\_guides.htm#Management%  
20Tests](http://www.bellsouth.com/employment/study_guides.htm#Management%20Tests)

(d) On-The –Job-Training consists of an experienced FA or ET observing the new hires performing necessary steps to complete each assigned task, which usually takes one to three weeks for the FAs and two to six weeks for the ETs.

REQUEST: For each switch identified in response to MCI-97 above, please provide the information requested in TABLE F-3.

**TABLE F-3**

Switch CLLI	Number Of Loops Per End- User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers <sup>1</sup>	Number of DSL Only End User Customers	Number of Line Shared/Line Split DSL End User Customers <sup>2</sup>
ABC	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100
	2		Residential			
	2		Business			
	3		Residential			
	3		Business			
	... (continue pattern as above)					
	18		Residential			
	18		Business			
	19-24		Residential			
	19-24		Business			
	one DS-1		Residential			
	one DS-1		Business			
	more than one DS-1		Business			

<sup>1</sup> This category includes loops used for fax and/or modem-only traffic.

<sup>2</sup> This category includes voice and DSL on the same wire pair (i.e. line sharing, line splitting, and ILEC voice plus data).

RESPONSE: BellSouth objects to this Interrogatory to the extent it seeks information that may not be within BellSouth's possession, custody, or control. BellSouth also objects to this Interrogatory to the extent that it seeks information in a format that is neither maintained in the ordinary course of BellSouth's business nor available to BellSouth on grounds that it is overly broad, unduly burdensome, and oppressive. Subject to these objections, and without waiving these objections,

SECOND SUPPLEMENTAL RESPONSE:

See BellSouth's Second Supplemental Response to MCI's First Request for Production of Documents, Item No. 1. This information is proprietary and is being provided subject to the protective agreement in this proceeding.

REQUEST: With respect to each of the two customer categories identified in response to MCI-110, please provide the following information:

- (a) the number of customers in each category, reported by central office/wire center for each month since July 1, 2001;
- (b) the percentage of your total customer base in Florida in each of the two categories;
- (c) whether you target your business plans or marketing to particular subsets of customers within each of the two categories identified in response to 110.

SECOND SUPPLEMENTAL RESPONSE:

- (a) Based upon BellSouth's acceptance of the FCC delineation between "mass market" customers and "enterprise" customers, please see BellSouth's Second Supplemental Response to MCI's First Set of Interrogatories, Item No. 98 for the number of customer in each category.
- (b) These percentages are not readily available. However, the information necessary to calculate such percentages is contained in BellSouth's Second Supplemental Response to MCI's First Set of Interrogatories, Item No. 98.
- (c) See BellSouth's Second Supplemental Response to MCI's First Set of Interrogatories, Item No. 110.

REQUEST: Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, monthly data since July 1, 2001 on the number of loops carrying DS-0/voice grade service on all of the following bases: 1) total loops in service 2) residential loops in service; 3) business loops for business with 1-3 loops in service; 4) business loops for businesses with more than 3 loops in service; 5) UNE loops.

SECOND SUPPLEMENTAL RESPONSE:

1) See BellSouth's response to MCI's 1<sup>st</sup> Request for Production, No. 1. This information is proprietary and is being provided subject to the terms of the non-disclosure agreement in this docket.

2) See BellSouth's response to MCI's 1<sup>st</sup> Request for Production, No. 1. This information is proprietary and is being provided subject to the terms of the non-disclosure agreement in this docket.

3) BellSouth does not separate Business Voice Grade 1-3 loops and more than 3 loops. However, data responsive to this request has been developed and is contained in BellSouth's Second Supplemental response to MCI's 1<sup>st</sup> Request for Production, No. 1. This information is proprietary and is being provided subject to the terms of the non-disclosure agreement in this docket.

4) BellSouth does not separate Business Voice Grade 1-3 loops and more than 3 loops. However, data responsive to this request has been developed and is contained in BellSouth's Second Supplemental response to MCI's 1<sup>st</sup> Request for Production, No. 1. This information is proprietary and is being provided subject to the terms of the non-disclosure agreement in this docket.

5) See BellSouth's response to MCI's 1<sup>st</sup> Request for Production, No. 1. This information is proprietary and is being provided subject to the terms of the non-disclosure agreement in this docket.

RESPONSE PROVIDED BY: Steve Bigelow  
Craig Williard



BellSouth Telecommunications, Inc.  
TRA Dkt No. 03-000491  
MCI/Brooks Fiber Document Requests  
October 27, 2003  
2<sup>nd</sup> SUPPLEMENTAL Item No. 1  
Page 1 of 1

REQUEST: Please produce all documents that were identified, or that should have been identified, in response to the preceding Interrogatories.

SECOND SUPPLEMENTAL RESPONSE:

Additional documents responsive to this request are being provided.

**Supplemental Response**

**BellSouth Telecommunications, Inc.**

**MCI/WorldCom's 1<sup>st</sup> Request for Production of Documents**

**Item No. 1**

**Bates Pages**

**BST000001 – BST000051**

**Proprietary**

**Public Disclosure Document**

**BellSouth Telecommunications, Inc.**

**MCI/WorldCom's 1<sup>st</sup> Request for Production of Documents**

**Item No. 1**

**Attachment to Interrogatory Item  
No. 19**

## BELLSOUTH TELECOMMUNICATIONS JOB BRIEFS AND QUALIFICATIONS

**Job Title:** **Electronic Technician**  
**Job Title Code:** **9115**  
**Wage Scale:** **32**

### **A. JOB RESPONSIBILITIES**

*Responsibilities may include but are not limited to the following:*

1. Works alone and with other employees in testing, adjusting and/or repairing central office equipment and facilities used in providing high quality network switching, trunking, and special services. Some examples of special services are: telephone, program (audio), video, foreign central office and exchange service, high speed data, packet switching, etc.
2. Makes routine tests on switching systems equipment, facilities, trunks and special service circuits to insure a high quality of service.
3. Analyzes defects, tests, repairs and maintains telephone switching circuits and equipment in Company central offices, remote repeater locations, and administrative buildings by using various test equipment. Makes necessary repairs to equipment and facilities indicated by trouble reports, routine tests and alarms.
4. Coordinates work operations with other employees required to make routine tests and repair equipment or facilities. Coordinates the installation, rearrangement and disconnection of plain old telephone service (POTS), trunks and special services.
5. Reviews and interprets service, circuit diagrams, layout records, or other technical documents (i.e., WORD documents), and follows standard practices for provisioning special services, carrier, and message circuit orders. Reviews and analyzes complex schematic drawings in performing work operations.
6. Installs, repairs and adjusts equipment such as switches, routers, modems, relays and amplifiers using hand tools.
7. Performs routine equipment maintenance such as inspecting, cleaning, testing and lubricating equipment.
8. Removes or places connections on wire distributing frames and connects wire to terminal lugs, following work orders and specifications.
9. Maintains the integrity of mechanized and manual records on facility and equipment assignments for POTS, trunks and special services. Also, maintains records required for trouble reports, routine tests, trouble clearance and work activities.

## **A. JOB RESPONSIBILITIES (Continued)**

10. Uses computer terminals associated with Operations Support Systems related to work operations.
11. Maintains telephone switching equipment at both private establishments (hotels and office buildings) and at other than regularly assigned central offices, which may require driving a Company vehicle between locations.
12. Tests, analyzes, corrects and/or repairs trouble reports and provides close-out to subscriber trouble reports.
13. Installs and performs hardware maintenance on a variety of computer systems, computer peripherals, and ancillary associated equipment.
14. Performs periodic preventive maintenance on computer systems through the use of sophisticated test equipment, software diagnostics.
15. Maintains computer systems including software back-ups in other departments.
16. Makes necessary tests for toxic and explosive gas before entering cable vaults and underground controlled environment vaults (CEVs) and continues tests while working in area.
17. Works with hot metal in some assignments, works with color coded and tone identified wires associated with the installation, maintenance and repair of carrier facilities.
18. Determines differences between wire and cable colors associated with equipment.
19. Works aloft on ladders with hand tools and test sets.
20. Follows established safety practices and procedures. Must be able to safely utilize equipment resources to perform specified physical job duties, i.e., satisfies manufacturer's specifications for operation or use of equipment including weight limitations.
21. Lifts and moves loads up to 100 pounds.
22. Cleans and sweeps up loose wire and other debris.
23. Drives Company vehicle.

**A. JOB RESPONSIBILITIES (Continued)**

- 24. Places and removes plug-in equipment.
- 25. Tests wire work performed to assure reliable service and to identify troubles.
- 26. Repairs and performs routine maintenance such as inspecting, cleaning, and testing of large batteries, rectifiers, converters, inverters, and operates emergency engines.

**B. BASIC QUALIFICATIONS**

*Candidates must meet the following minimum qualifications:*

Testing	Training	Other Requirements
See Non-Management Job Title Test Matrix and Test Study Guides <a href="http://www.asisvcs.com/bellsouth/testtips.html">www.asisvcs.com/bellsouth/testtips.html</a>	The following must be satisfactorily completed for title retention: <ul style="list-style-type: none"> <li>✓ On-the-job and/or classroom training as required</li> <li>✓ SS508 Principals of Digital Transmission Systems</li> </ul>	<ul style="list-style-type: none"> <li>✓ Satisfactory performance and attendance in present job.</li> <li>✓ Satisfactory background investigation.</li> <li>✓ Valid driver's license and ability to drive vehicle with manual shift in some assignments.</li> <li>✓ Ability to perceive differences in wire and cable colors.</li> <li>✓ Ability to differentiate between audible tones.</li> </ul>

**C. GENERAL WORKING CONDITIONS/PHYSICAL REQUIREMENTS**

*Successful candidates require the ability to:*

- ✓ Work various scheduled tours including day, evening and night, covering Sunday through Saturday with overtime, call-outs and holiday work as required. Tour length will be 8 hours.
- ✓ Work alone at remote repeater locations and/or in controlled environment vaults or in a work center environment.
- ✓ Work aloft on ladders with hand tools and test sets; and lift and move loads up to 100 pounds.

**D. ADDITIONAL FACTORS TO BE CONSIDERED**

- ✓ Experience in electrical, electronic or mechanical field.

Individuals holding this job title may be required to perform the above job duties with or without "reasonable accommodations."

## BELLSOUTH TELECOMMUNICATIONS JOB BRIEFS AND QUALIFICATIONS

**Job Title:** **Frame Attendant**  
**Job Title Code:** **1461**  
**Wage Scale:** **24**

### **A. JOB RESPONSIBILITIES**

*Responsibilities may include but are not limited to the following:*

1. Reviews and interprets service orders or equivalent and follows standard practices.
2. Connects, disconnects, removes, rearranges and maintains wires inside a central office connecting customers' lines with central office equipment.
3. Determines differences in wire and cable colors.
4. Completes work by using hand tools such as pliers, screwdriver, soldering iron and special test equipment.
5. Climbs ladders and performs work assignments aloft.
6. Pulls wire and carries test equipment, wire coils and associated equipment weighing up to 60 pounds.
7. Determines work to be done by reviewing service orders and other Company issued documents.
8. Makes or assists other craft employees in making tests and checks of equipment.
9. Routinely inspects all parts of the frames.
10. Cleans and sweeps up loose wire and other debris.
11. Works alone or with others in a large room with narrow aisles crowded with rows of frame and switching equipment.
12. Places and removes plug-in circuit equipment.
13. Maintains integrity of mechanized and manual records on facility and equipment assignments for plain old telephone service (POTS); and performs data base verifications using computer terminal associated with Operations Support Systems.
14. Tests wire work performed to assure reliable service and identify troubles; tests and analyzes frame trouble reports; corrects or repairs trouble and closes out reports to subscribers.

**A. JOB RESPONSIBILITIES (Continued)**

15. Handles permanent signals and calling party hold alarms; changes mechanized tapes in some assignments.
16. Follows established safety practices and procedures. Must be able to safely utilize equipment resources to perform specified physical job duties, i.e., satisfies manufacturer's specifications for operation or use of equipment including weight limitations.
17. Drives Company vehicle.

**B. BASIC QUALIFICATIONS**

*Candidates must meet the following minimum qualifications:*

Testing	Training	Other Requirements
See Non-Management Job Title Test Matrix and Test Study Guides ( <a href="http://www.asisvcs.com/bellsouth/testtips.html">www.asisvcs.com/bellsouth/testtips.html</a> )	The following must be satisfactorily completed for title retention: ✓ On-the-job and/or classroom training as required	<ul style="list-style-type: none"> <li>✓ Satisfactory performance and attendance in present job.</li> <li>✓ Satisfactory background investigation.</li> <li>✓ Valid driver's license and ability to drive vehicle with manual shift in some assignments.</li> <li>✓ Ability to perceive differences in wire and cable colors.</li> </ul>

**C. GENERAL WORKING CONDITIONS/PHYSICAL REQUIREMENTS**

*Successful candidates require the ability to:*

- ✓ Work various scheduled tours including day, evening and night covering Sunday through Saturday with overtime, call-outs and holiday work as required. Tour length will be 8 hours.
- ✓ Work alone or with others in a large room with narrow aisles crowded with rows of frame equipment.
- ✓ Climb ladders, work aloft, and lift and move equipment weighing up to 60 pounds.

**D. ADDITIONAL FACTORS TO BE CONSIDERED**

- ✓ Knowledge of service orders.

Individuals holding this job title may be required to perform the above job duties with or without "reasonable accommodations."



**Supplemental Response**

**BellSouth Telecommunications, Inc.**

**MCI/WorldCom's 1<sup>st</sup> Request for Production of Documents**

**Item No. 1**

**Bates Pages**

**BST000058 – BST000983**

**Proprietary**

Public Disclosure Document

### CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2003, a copy of the foregoing document was served on the parties of record, via the method indicated:

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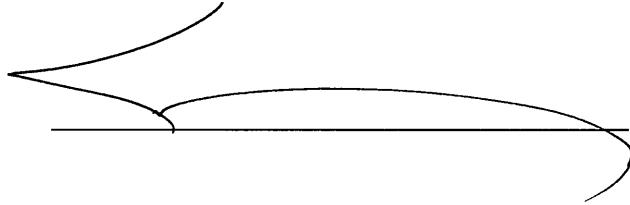
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A handwritten signature in black ink, appearing to read "Ken Woods", written over a horizontal line.